

1.0 Introduction

This volume of the final Hanford Solid Waste Environmental Impact Statement (HSW EIS) consists of responses to comments the U.S. Department of Energy (DOE) received on the revised draft HSW EIS. The public comment and related processes are described below.

1.1 Background

DOE issued the first *Draft Hanford Site Solid (Radioactive and Hazardous) Waste Program Environmental Impact Statement*, Richland, Washington (HSW EIS) (DOE 2002a), in April 2002. The purpose of the HSW EIS was to assess potential impacts from a range of alternatives to receive, process, treat, store, and dispose of low-level (LLW), mixed low-level (MLLW), and transuranic (TRU) solid wastes generated at Hanford and received from other DOE sites. The document provided the results of analyses performed to help decision makers and the public understand the potential environmental impacts of the described alternatives and options. The first draft HSW EIS was distributed to the public in May 2002, and the U.S. Environmental Protection Agency (EPA) announced the availability of the draft HSW EIS for public review and comment in the Federal Register on May 24, 2002 (67 FR 36592); this announcement began a 90 day comment period that ended on August 22, 2002.

DOE received over 3,800 comments on the first draft HSW EIS from Federal agencies; state, local, and tribal governments; public and private organizations; and individuals. These comments were presented as recorded statements at the public meetings; in written documents submitted at those meetings; or sent to DOE by regular mail, email, and fax.

The revised draft HSW EIS (DOE 2003) was prepared to address those comments and to incorporate new alternatives that had been under consideration after the first draft was prepared. It also incorporated alternatives for disposal of immobilized low activity waste (ILAW) from the Hanford tank waste treatment plant, which was initially to be the subject of a separate National Environmental Policy Act (NEPA) review. The revised draft HSW EIS reflected the considerable input from Federal and State regulators, as well as from members of the public and other stakeholders, with the aim of ensuring that critical issues were addressed. The revised draft contained a range of changes that respond to the fundamental concerns raised in these comments by:

- adding alternatives for disposal of ILAW
- addressing regulatory and stakeholder concerns by expanding the range and depth of alternatives analyzed
- distinguishing between “Hanford Only” waste volumes and those projected to originate offsite
- describing more fully how transporting waste could impact residents of Washington and Oregon
- expanding discussion of cumulative impacts, including those affecting groundwater

- expanding discussion of potential long term impacts for each alternative
- providing additional information on potential mitigation measures
- discussing the relationship of the HSW EIS to cleanup at the Hanford Site and other DOE facilities.

The revised draft HSW EIS (DOE 2003) was released for public review and comment in April 2003. Notification of the revised draft's availability and opening of a 47-day public comment period (April 11, 2003 through May 27, 2003) was published by EPA in the Federal Register (68 FR 17801). At the request of the public a 15-day extension (to June 11, 2003) to the original 47-day public comment period was granted by DOE and published by EPA in the Federal Register (68 FR 28821, 68 FR 32486).

Commenters were invited to submit their comments by regular mail, electronic mail (email), facsimile transmission (faxes), and at six public meetings at different locations. Table 1.1 lists the locations and dates of the public meetings. DOE representatives were available one hour prior to the start of the public meeting for informal discussions and to answer questions regarding the HSW EIS.

This Comment Response Document (CRD) includes responses to over 1,600 comments that the DOE received on the revised draft HSW EIS. DOE also responded to comments received after June 11, 2003, to the extent practicable.

The table in Section 4 (of this Volume III of the final HSW EIS) provides locations in the document for all of the comments received from organizations and individuals. On several occasions, speakers at public meetings represented various organizations. In such cases, the table lists the person who spoke at the meeting and their organizational affiliation.

1.2 Methodology

Because there were a large number of submittals (letters, emails, faxes, comment forms, public meeting transcripts) received during the public comment periods and the fact many of the comments were similar, DOE elected to group similar comments together and provide one response to the comments. DOE also corrected obvious typographical errors found in the comments.

The following list highlights key aspects of the DOE approach to capturing, tracking, and responding to comments.

- DOE read all comment documents and their attachments to identify and extract comments. As a part of this process, DOE also reviewed technical attachments (e.g., reports) for potential applicability to the HSW EIS. DOE then grouped similar comments together and developed responses for them. To prepare a response, technical comments were assigned to an expert in the appropriate discipline.

- When more than one commenter submitted identical or similar comments, DOE prepared a single response for the grouped comments. A single response was appropriate because of the similarity of their content and the number of comments received.
- Comments were extracted from comment documents as submitted by the commenters. That is, with the exception of correcting obvious errors and other minor modifications (see next bullet), DOE has neither edited nor rewritten the comments submitted. However, in some cases to ensure clarity, DOE did add words in brackets; e.g., “it [waste importation] must stop.”
- DOE, similarly, did not modify comments excerpted from certified transcripts of public meetings. However, some transcripts contained obvious errors (for example, misspelled names or words). And, in some cases to ensure clarity, some clarifying words were added in brackets as noted in the previous bullet.
- When the meaning of a comment was not clear, DOE responded based on its interpretation of the comment.
- The comment documents and meeting transcripts are reproduced in their entirety in Volume IV of the final HSW EIS.
- In the Volume IV reproduced documents, text interpreted to be comments on the revised draft HSW EIS are marked with numbered side bars.

1.3 Public Involvement and Comment Acquisition

DOE has made extensive efforts to keep the public aware of the development of the HSW EIS and to allow the public opportunities to review and comment on drafts of the document. DOE used an open process and multiple means for inviting and receiving comments.

1.3.1 Revised Draft HSW EIS

The public involvement process for the revised draft HSW EIS consisted of several outreach efforts:

- mailing postcards to over 1,300 interested individuals and organizations announcing the release of the revised draft HSW EIS and providing opportunity for recipients to request the document
- holding meetings with regulatory agencies, the Hanford Advisory Board (HAB) – a Federal Advisory Committee – etc.
- publishing the availability of the revised draft HSW EIS through (EPA’s) Notice of Availability in the April 11, 2003 Federal Register (68 FR 17801)

- mailing fact sheets describing the revised draft EIS and announcing the dates and times for public meetings to over 3,300 interested individuals and organizations
- distributing over 1,000 copies of the revised draft HSW EIS summary or full document primarily as a printed summary with compact disks (CDs) containing the full document. Full copies of the printed document were made available on request
- placing newspaper advertisements to announce public meetings in Richland, Spokane, and Seattle, Washington, and in Hood River, Portland, and La Grande, Oregon.

During the review period, DOE held six public meetings (see Table 1.1). The format for the meetings included an opportunity for informal discussions with project personnel before and after the formal presentation. Panel discussions were conducted at each meeting and included DOE staff, regulatory agency representatives, and local interest groups. Commenters were heard on a first come, first served basis. DOE encouraged those providing oral comments at the meetings to submit them in writing as well.

Table 1.1. Public Meetings Related to the Revised draft HSW EIS

Date	Time	City	Facility
May 1, 2003	7:00 – 10:00 pm	Richland, WA	Red Lion Hanford House
May 7, 2003	7:00 – 10:00 pm	Spokane, WA	West Coast River Inn
May 12, 2003	7:00 – 10:00 pm	La Grande, OR	Best Western
May 13, 2003	7:00 – 10:00 pm	Portland, OR	Radisson Hotel
May 14, 2003	7:00 – 10:00 pm	Hood River, OR	Best Western Hood River Inn
May 15, 2003	7:00 – 10:00 pm	Seattle, WA	Woodland Park Zoo Auditorium

1.3.2 Final HSW EIS

DOE assessed and considered all public comments received on the revised draft HSW EIS during the comment period, both individually and collectively. DOE developed a database to track and manage comments received on the revised draft HSW EIS. Documents/comments received were assigned an individual, identification number in accordance with the designation system described in Table 1.2. Each document received (email, form, letter, or transcript of each speaker at a public meeting) was evaluated for substantive comments that pertained to the HSW EIS, and each identified comment was assigned a sequential number within each document. In a few cases, the comment numbers were not sequential due to adjustments made during the comment response process.

DOE meetings/hearings to acquire comments on the Revised Draft Hanford Solid (Radioactive and Hazardous) Waste Management Program Environmental Impact Statement were conducted in a combination of forums to allow full participation of the audience and commenters. The overall forum consisted of periods for introductions, presentations, informal question and answer session, panel discussions, and formal comment periods. The identification of comments from the transcripts of these meetings required close reading and interpretation. The results are shown in the identification of formal

comment speakers, numbering of comments related to the revised HSW EIS, and bar-coding of copies of the transcripts contained in Volume IV of the HSW EIS.

Material, such as attachments to comment letters (and other comment documents) that included comments already submitted on the first draft HSW EIS, comments pertaining to other Hanford environmental review documents, and text within comment documents redundant with other text recorded as comments, was not included as comments.

A listing of the individuals and organizations that commented on the revised draft HSW EIS appears in Section 4 of this volume, and is organized alphabetically by commenting organization or individual commenter. The comments and DOE responses are contained in Section 3 of this volume.

Table 1.2. Comment Document Numbering System

P	Postcard – containing individual unique comments.	F	Comment form – comments received from forms available at each of the six public meetings.
E	Email – individual, unique comments.	TRI	Transcript Richland – transcripts from the public meeting held in Richland, May 1, 2003.
EM	Mass email – consisting of identical comments per each email.	TSP	Transcript Spokane -- transcripts from the public meeting held in Spokane, May 7, 2003.
EMM	Modified mass email – consisting of comments that are a variation on a mass email.	TLG	Transcript La Grande -- transcripts from the public meeting held in La Grande, May 12, 2003.
L	Letter – containing individual unique comments.	TPO	Transcript Portland -- transcripts from the public meeting held in Portland, May 13, 2003.
LM	Mass letter – consisting of identical comments per letter.	THR	Transcript Hood River -- transcripts from the public meeting held in Hood River, May 14, 2003.
LMM	Modified mass letter – consisting of comments that are a variation on a mass letter.	TSE	Transcript Seattle -- transcripts from the public meeting held in Seattle, May 15, 2003.

A number of the responses to comments may refer to supporting documents. The reference list in this CRD includes only the documents cited in this volume of the final HSW EIS. References cited in other volumes of the HSW EIS are listed in those volumes. All documents cited as references in the HSW EIS are available through the DOE reading room in Richland, Washington.

1.4 How to Use this Comment Response Document

The HSW EIS Comment Response Document is provided in two volumes: HSW EIS Volume III and HSW EIS Volume IV. HSW EIS Volume III consists of an introduction section (Section 1), a discussion of key issues (Section 2), comments and responses (Section 3), an index (Section 4), and references (Section 5). HSW EIS Volume IV contains copies of public meeting transcripts and all comment documents received during the public comment period for the revised draft HSW EIS.

Individuals and organizations that submitted comments on the HSW EIS can examine their comments and see the DOE responses by using HSW EIS Volume III Section 3, HSW EIS Volume III Section 4,

and HSW EIS Volume IV. Guidance regarding the layout and use of HSW EIS Volume III and HSW EIS Volume IV is outlined below:

- Copies of comment documents and transcripts are provided in HSW EIS Volume IV. The documents are in alpha-numeric order based on the document and comment numbering system previously explained in Section 1.3.2 and Table 1.2 herein (HSW EIS Volume III). Each comment within each document is indicated by a sidebar and a corresponding number.
- HSW EIS Volume III Section 3 presents the comments on the revised draft HSW EIS and the DOE responses. Database management techniques were used to compile the comments and assign responses. In some instances the comments were edited for typographical and minor grammatical corrections. Bracketed text “[]” was added to some of the comments to complete the comment or to add context for response.
- At the top of each page in HSW EIS Volume III Section 3 is a heading that summarizes the general subject area of the comment(s) and response(s) that appear on that page.
- HSW EIS Volume III Section 4 is an index table for the locations of comments. Individuals and organizations are listed alphabetically according to their last names. To find the organization that an individual commenter belongs to, one can look up the person’s name in the table and immediately below the name is the organization the individual represents.
- Alternatively, to find an individual speaking for a particular organization, the individual’s name may be presented directly below the organizational title. For example, Tom Fitzsimmons (Document Identifier L-0044) is listed as an individual who submitted comments on behalf of the Washington Department of Ecology. Mr. Fitzsimmons also is listed below the Washington Department of Ecology index name.
- To find a comment and the DOE response, locate the name of the person commenting and the associated list of comments in the HSW EIS Volume III Section 4 Comment IDs column. The HSW EIS Volume III Section 3 page number for each comment is identified in the Page Numbers column.
- Multiple comment identification numbers appearing above certain comments indicates multiple identical/similar comments. For instance, examples of identical comments are those received in duplicate letters, mass-mailed letters, and comments from the same sender received by both letter and e-mail.
- The DOE response follows each comment. For groups of related comments with a single DOE response, the DOE response appears after the list of comments.
- For those comments that are brief, are made by one individual only, or have been grouped with very few other related comments, the page number in the index table will be the same as the page number in HSW EIS Volume III Section 3. For comments that are grouped with large numbers of related comments, a particular comment may be located by turning to the index table page number and scanning the page and, if necessary, succeeding pages to locate the comment. Comments are listed in alphabetical order according to the comment identification numbers.

- For readers who first review HSW EIS Volume III front-to-back, or by particular subject areas of interest, the comment identifiers and the HSW EIS Volume III Section 4 index table can also be used to trace comments back to their source documents in HSW EIS Volume IV.

As an example, the Washington State Department of Ecology's letter (Document Identifier L-0044) contains 144 identified comments – see pages 4.18 and 4.74 of this HSW EIS Volume III. The comments are listed in the Section 4 table under "Washington Department of Ecology" beginning on page 4.73. The fifth comment in the letter (Comment Identifier L-0044/005) can be located by turning to page number 3.200. This is the beginning of the list of comments related to comment L-0044/005 that are all addressed with the same response. The reader then scans page 3.199 and the following page to locate comment L-0044/005. The L-0044/005 comment identification number and the text of the comment are found at the top of page 3.200. The response to this comment follows the list of related comments and is in the middle of page 3.200. The L-0044 comments are also listed under "Fitzsimmons, Tom" beginning on page 4.18 of the table in Section 4.